

# **EXHIBIT B**

**CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

WALCO FUNDING, LLC, )  
                            )  
Plaintiff,               )  
                            )  
v.                        )  
                            ) 2023 L 012436  
DRIVERSMART AUTO CARE, INC., )  
NATIONWIDE VEHICLE ASSURANCE )  
CORP. d/b/a MOTOR VEHICLE )  
ASSURANCE, and DANIEL J. RODD, )  
                            )  
Defendants.             )

**DEFENDANTS' FIRST INTERROGATORY TO PLAINTIFF**

1. Identify each of WalCo Funding, LLC's members.
  - a. For each individual member identified in response to Interrogatory 1, provide their names, primary residency, business addresses and citizenship.
  - b. For each business entity identified in response to Interrogatory 1, provide its names, venue of incorporation, primary place of business, corporate offices, and agent of service of process.

Dated: Chicago, Illinois  
January 23, 2024

Respectfully submitted,



Adam Goodman

Adam Goodman  
GOODMAN TOVROV HARDY & JOHNSON LLC  
105 West Madison Street, Suite 2300  
Chicago, Illinois 60602  
312.238.9592  
312.264.2535 [fax]  
[agoodman@goodtov.com](mailto:agoodman@goodtov.com)

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on January 23, 2024, he caused a copy of the attached **Interrogatory** to be served via e-mail upon:

Matthew R. Barrett  
Maxwell A. Kling  
HORWOOD MARCUS & BERK CHARTERED  
500 W. Madison St., Ste. 3700  
Chicago, IL 60661  
[mbarrett@hmlblaw.com](mailto:mbarrett@hmlblaw.com)  
[mkling@hmlblaw.com](mailto:mkling@hmlblaw.com)



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Adam Goodman